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WINSTON  
& STRAWN  
LLP

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December 14, 2010

**BY ECF AND FEDERAL EXPRESS**

Honorable Claire C. Cecchi, U.S.M.J.  
United States District Court  
Martin Luther King, Jr. Federal Building  
and U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

BEIJING

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SHANGHAI

WASHINGTON, D.C.

**Re: Taro Pharmaceuticals North America, Inc. et al. v.  
Synerx Pharma, LLC et al.  
Civil Action No. 09 CV 3569 (JLL) (CCC)**

Dear Judge Cecchi:

This firm represents Plaintiffs, Taro Pharmaceuticals North America, Inc. and Taro Pharmaceuticals U.S.A., Inc. ("Taro"), in the above-captioned matter. Enclosed please find a copy of the following, submitted on Taro's behalf:

1. Declaration of James S. Richter in support of application for admission of counsel *pro hac vice*;
2. Declaration of James F. Hurst;
3. Declaration of David S. Bloch; and
4. Proposed form of Order granting admission *pro hac vice*.

Defendants' counsel has consented to this application and the *pro hac vice* admission of counsel.

If the enclosed proposed form of Order is acceptable to Your Honor, we respectfully request that it be entered.

Respectfully submitted,

  
Jeffrey P. Catenacci

WINSTON  
& STRAWN  
LLP

December 14, 2010  
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Enclosures

cc: All Counsel (by ECF)

WINSTON & STRAWN LLP  
The Legal Center  
One Riverfront Plaza  
Suite 730  
Newark, New Jersey 07102  
(973) 848-7676  
James S. Richter  
Jeffrey P. Catenacci

Attorneys for Plaintiffs, Taro Pharmaceuticals  
North America, Inc. and Taro Pharmaceuticals  
U.S.A., Inc.

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

_____	x	
	:	
TARO PHARMACEUTICALS NORTH	:	Honorable Jose L. Linares, U.S.D.J.
AMERICA, INC. and TARO	:	
PHARMACEUTICALS U.S.A., INC.,	:	Civil Action No. 09 CV 3569 (JLL)(CCC)
	:	
	:	
Plaintiffs,	:	
	:	
v.	:	<b>DECLARATION OF JAMES S. RICHTER</b>
	:	<b>IN SUPPORT OF APPLICATION FOR</b>
SYNERX PHARMA, LLC; KARALEX	:	<b>ADMISSION OF COUNSEL</b>
PHARMA, LLC; and DPT LABORATORIES,	:	<b><i>PRO HAC VICE</i></b>
LTD.,	:	
	:	
Defendants.	:	
_____	x	

JAMES S. RICHTER, of full age, hereby declares as follows:

1. I am an attorney at law of the State of New Jersey and a member of Winston & Strawn LLP, attorneys for Plaintiffs, Taro Pharmaceuticals North America, Inc. and Taro Pharmaceuticals U.S.A., Inc. ("Taro").
2. This Declaration is submitted in support of Taro's application to admit James F. Hurst and David S. Bloch *pro hac vice* in this matter.

3. I am a member of Winston & Strawn's Newark, New Jersey office and a member in good standing of the Bar of the Supreme Court of New Jersey and the Bar of the District Court of New Jersey. No disciplinary proceedings are pending against me, and no discipline has previously been imposed upon me, by any court in any jurisdiction.

4. I, or other members of the New Jersey Bar and the Bar of the District Court of New Jersey who are employed in our Newark office, will sign all pleadings, briefs, and other papers filed with the Court and will be responsible for said papers and for the conduct of the case. Additionally, I, or other members of the New Jersey Bar and the Bar of the District Court of New Jersey who are employed in our Newark office, will be present before the Court during all phases of this proceeding and I will be responsible for the conduct of the attorneys admitted *pro hac vice*.

5. This firm agrees to abide by *L. Civ. R.* 11.1 and 101.1(c) in filing pleadings, briefs, and other papers with the Court.

6. Defendants' counsel has consented to this motion and the *pro hac vice* admission of counsel.

7. Pursuant to *L. Civ. R.* 7.1(d)(4), no brief is necessary for this motion because all facts in support of this motion are set forth in the Declarations of James F. Hurst and David S. Bloch (which are submitted herewith), and there are no legal issues that must be briefed in connection with this motion.

I hereby declare under the penalty of perjury that the foregoing statements made by me are true and correct.

  
James S. Richter

Dated: December 14, 2010

WINSTON & STRAWN LLP  
The Legal Center  
One Riverfront Plaza  
Suite 730  
Newark, New Jersey 07102  
(973) 848-7676  
James S. Richter  
Jeffrey P. Catenacci

Attorneys for Plaintiffs, Taro Pharmaceuticals  
North America, Inc. and Taro Pharmaceuticals  
U.S.A., Inc.

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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TARO PHARMACEUTICALS NORTH  
AMERICA, INC. and TARO  
PHARMACEUTICALS U.S.A., INC.,

Plaintiffs,

v.

SYNERX PHARMA, LLC; KARALEX  
PHARMA, LLC; and DPT LABORATORIES,  
LTD.,

Defendants.

---

x

: Honorable Jose L. Linares, U.S.D.J.

: Civil Action No. 09 CV 3569 (JLL)(CCC)

: **DECLARATION OF JAMES F. HURST**  
: **IN SUPPORT OF APPLICATION**  
: **FOR ADMISSION *PRO HAC VICE***

x

JAMES F. HURST, of full age, hereby declares as follows:

1. I am a member of Winston & Strawn LLP, attorneys for Plaintiffs, Taro Pharmaceuticals North America, Inc. and Taro Pharmaceuticals U.S.A., Inc. ("Taro").
2. This Declaration is submitted in support of my application for admission *pro hac vice* in this matter.

3. I principally practice law in Winston & Strawn's Chicago offices, which are located at 35 West Wacker Drive, Chicago, Illinois 60601. I received a B.S. degree from the University of Delaware in 1986 and a J.D. degree from the University of Pennsylvania Law School in 1989. I am a member in good standing of the Bar of the State of Illinois and have been since my admission in 1989.

4. The office maintaining the roll of members for the Bar of the State of Illinois is the Attorney Registration & Disciplinary Commission of the Supreme Court of Illinois, One Prudential Plaza, 130 East Randolph Drive, Suite 1500, Chicago, Illinois 60601-6219.

5. I am a member in good standing of the Bar of the United States District Court for the Northern District of Illinois and have been since my admission in 1991.

6. The office maintaining the roll of members for the United States District Court for the Northern District of Illinois is the Clerk's Office, United States District Court, Northern District of Illinois, Attorney Admissions, 219 S. Dearborn Street, Room 2050, Chicago, Illinois 60604.

7. I am a member in good standing of the Bar of the United States District Court for the Eastern District of Texas and have been since my admission in 2007.

8. The office maintaining the roll of members for the United States District Court for the Eastern District of Texas is the Attorney Admissions Clerk, United States District Court, Eastern District of Texas, 300 Willow Street, Room 104, Beaumont, Texas 77701.

9. I am a member in good standing of the Bar of the United States Court of Appeals for the Seventh Circuit and have been since my admission in 1993.

10. The office maintaining the roll of members for the United States Court of Appeals for the Seventh Circuit is the Clerk, United States Court of Appeals for the Seventh Circuit, 219 S. Dearborn Street, Room 2722, Chicago, Illinois 60604.

11. I am a member in good standing of the Bar of the United States Court of Appeals for the Ninth Circuit and have been since my admission in 2007.

12. The office maintaining the roll of members for the United States Court of Appeals for the Ninth Circuit is the Clerk's Office, Attorney Admissions, United States Court of Appeals for the Ninth Circuit, P.O. Box 193939, San Francisco, California 94119-3939.

13. I am a member in good standing of the Bar of the United States Court of Appeals for the District of Columbia Circuit and have been since my admission in 1999.

14. The office maintaining the roll of members for the United States Court of Appeals for the District of Columbia Circuit is the Clerk's Office, United States Court of Appeals for the District of Columbia Circuit, 333 Constitution Avenue, NW, Room 5523, Washington, D.C. 20001-2866.

15. I am a member in good standing of the Bar of the United States Court of Appeals for the Federal Circuit and have been since my admission in 1993.

16. The office maintaining the roll of members for the United States Court of Appeals for the Federal Circuit is the Clerk of Court, United States Court of Appeals for the Federal Circuit, 717 Madison Place, NW, Washington, D.C. 20439.

17. I am a member in good standing of the Bar of the Supreme Court of the United States and have been since my admission in 2001.

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18. The office maintaining the roll of members for the Supreme Court of United States is the Clerk, Admissions Office, Supreme Court of United States, 1 First Street, NE, Washington, D.C. 20543-0001.

19. No disciplinary proceedings are pending against me, and no discipline has previously been imposed upon me, by any court in any jurisdiction.

20. I will be associated in this matter with James S. Richter and Jeffrey P. Catenacci, attorneys in Winston & Strawn's Newark, New Jersey office, who are members in good standing of the Bar of the Supreme Court of New Jersey and the Bar of the District Court of New Jersey, and other members of the New Jersey Bar and the Bar of the District of New Jersey who are employed in our Newark office.

21. Taro has requested that I be involved as trial counsel in its representation in this matter.

22. There is good cause for my admission *pro hac vice* in that I have particular knowledge and expertise regarding the facts and legal issues presented by this matter.

23. I have never been denied admission *pro hac vice* in any jurisdiction.

24. If admitted to practice before this Court *pro hac vice*, I will abide by the Rules of Disciplinary Procedures of this Court, as well as *L. Civ. R. 101.1(c)*.

25. Defendants' counsel has consented to my *pro hac vice* admission.

26. Consequently, I respectfully request that the Court grant my admission *pro hac vice*.

I hereby declare under penalty of perjury, that the foregoing statements made by me are true and correct.

Dated: December 10, 2010



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James F. Hurst



WINSTON & STRAWN LLP  
The Legal Center  
One Riverfront Plaza  
Suite 730  
Newark, New Jersey 07102  
(973) 848-7676  
James S. Richter  
Jeffrey P. Catenacci

Attorneys for Plaintiffs, Taro Pharmaceuticals  
North America, Inc. and Taro Pharmaceuticals  
U.S.A., Inc.

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

_____	x
TARO PHARMACEUTICALS NORTH	:
AMERICA, INC. and TARO	:
PHARMACEUTICALS U.S.A., INC.,	:
	:
Plaintiffs,	:
	:
v.	:
	:
SYNERX PHARMA, LLC; KARALEX	:
PHARMA, LLC; and DPT LABORATORIES,	:
LTD.,	:
	:
Defendants.	:
_____	x

Honorable Jose L. Linares, U.S.D.J.  
Civil Action No. 09 CV 3569 (JLL)(CCC)

**DECLARATION OF DAVID S. BLOCH  
IN SUPPORT OF APPLICATION  
FOR ADMISSION *PRO HAC VICE***

DAVID S. BLOCH, of full age, hereby declares as follows:

1. I am a member of Winston & Strawn LLP, attorneys for Plaintiffs, Taro Pharmaceuticals North America, Inc. and Taro Pharmaceuticals U.S.A., Inc. ("Taro").
2. This Declaration is submitted in support of my application for admission *pro hac vice* in this matter.

3. I principally practice law in Winston & Strawn's San Francisco office, which is located at 101 California Street, 39th Floor, San Francisco, California 94111. I received a B.A. degree in 1993 from Reed College, a Master of Public Health in 1996 from the George Washington University School of Medicine and Health Services, and a J.D. degree in 1996 from George Washington University Law School. I am a member in good standing of the Bar of the State of California and have been since my admission in 1996. I am also a member in good standing of the Bar of the District of Columbia since 1998.

4. The office maintaining the roll of members for the Bar of the State of California is 180 Howard Street, San Francisco, CA 94105. The office maintaining the roll of members for the Bar of the District of Columbia is 1101 K Street NW, Suite 200, Washington DC 20005.

5. I am a member in good standing of the Bar of the United States District Court for the Northern District of California and have been since my admission in 1996.

6. The office maintaining the roll of members for the United States District Court for the Northern District of California is the Clerk's Office, United States District Court, Northern District of California, Attention: Attorney Admissions, 450 Golden Gate Avenue, San Francisco, CA 94102.

7. I am a member in good standing of the Bar of the United States District Court for the Southern District of California and have been since my admission in 2000.

8. The office maintaining the roll of members for the United States District Court for the Southern District of California is the Clerk's Office, United States District Court, Southern District of California, Attention: Attorney Admissions, 880 Front Street, Suite 4290, San Diego, CA 92101-8900.

9. I am a member in good standing of the Bar of the United States District Court for the Central District of California and have been since my admission in 2000.

10. The office maintaining the roll of members for the United States District Court for the Central District of California is the Clerk's Office, United States District Court, Central District of California, Attention: Attorney Admissions, 312 North Spring Street, Room 529, Los Angeles, CA 90012.

11. I am a member in good standing of the Bar of the United States District Court for the Eastern District of California and have been since my admission in 2000.

12. The office maintaining the roll of members for the United States District Court for the Eastern District of California is the Clerk's Office, United States District Court, Eastern District of California, Attention: Attorney Admissions, 501 I Street, Room 4-200, Sacramento, CA 95814.

13. I am a member in good standing of the Bar of the United States District Court for the District of Colorado and have been since my admission in 1999.

14. The office maintaining the roll of members for the United States District Court for the District of Colorado is the Clerk's Office, United States District Court, District of Colorado, Attention: Attorney Admissions, Alfred A. Arraj United States Courthouse, Room A105, 901 19th Street, Denver, CO 80294-3589.

15. I am a member in good standing of the Bar of the United States District Court for the Northern District of Illinois and have been since my admission in 2004.

16. The office maintaining the roll of members for the United States District Court for the Northern District of Illinois is the Clerk's Office, United States District Court, Northern District of Illinois, Attention: Attorney Admissions, 219 S. Dearborn St., Room 2050, Chicago, IL 60604.

17. I am a member in good standing of the Bar of the United States District Court for the Eastern District of Michigan and have been since my admission in 2007.

18. The office maintaining the roll of members for the United States District Court for the Eastern District of Michigan is the Clerk's Office, United States District Court, Eastern District of Michigan, Attention: Attorney Admissions, 231 W. Lafayette Blvd., Detroit, MI 48226.

19. I am a member in good standing of the Bar of the United States Court of Appeals for the Ninth Circuit and have been since my admission in 1996.

20. The office maintaining the roll of members for the United States Court of Appeals for the Ninth Circuit is the Clerk's Office, Attorney Admissions, United States Court of Appeals for the Ninth Circuit, P.O. Box 193939, San Francisco, California 94119-3939.

21. I am a member in good standing of the Bar of the United States Court of Appeals for the Federal Circuit and have been since my admission in 2000.

22. The office maintaining the roll of members for the United States Court of Appeals for the Federal Circuit is the Clerk of Court, United States Court of Appeals for the Federal Circuit, 717 Madison Place, NW, Washington, D.C. 20439.

23. I am a member in good standing of the Bar of the Supreme Court of the United States and have been since my admission in 2002.

24. The office maintaining the roll of members for the Supreme Court of United States is the Clerk, Admissions Office, Supreme Court of United States, 1 First Street, NE, Washington, D.C. 20543-0001.

25. No disciplinary proceedings are pending against me, and no discipline has previously been imposed upon me, by any court in any jurisdiction.

26. I will be associated in this matter with James S. Richter and Jeffrey P. Catenacci, attorneys in Winston & Strawn's Newark, New Jersey office, who are members in good standing of the Bar of the Supreme Court of New Jersey and the Bar of the District Court of New Jersey,

and other members of the New Jersey Bar and the Bar of the District of New Jersey who are employed in our Newark office.

27. Taro has requested that I be involved in its representation in this matter.

28. There is good cause for my admission *pro hac vice* in that I have particular knowledge and expertise regarding the facts and legal issues presented by this matter.

29. I have never been denied admission *pro hac vice* in any jurisdiction.

30. If admitted to practice before this Court *pro hac vice*, I will abide by the Rules of Disciplinary Procedures of this Court, as well as *L. Civ. R. 101.1(c)*.

31. Defendants' counsel has consented to my *pro hac vice* admission.

32. Consequently, I respectfully request that the Court grant my admission *pro hac vice*.

I hereby declare under penalty of perjury, that the foregoing statements made by me are true and correct.

  

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David S. Bloch

Dated: December 13, 2010

WINSTON & STRAWN LLP  
The Legal Center  
One Riverfront Plaza  
Suite 730  
Newark, New Jersey 07102  
(973) 848-7676  
James S. Richter  
Jeffrey P. Catenacci

Attorneys for Plaintiffs, Taro Pharmaceuticals  
North America, Inc. and Taro Pharmaceuticals  
U.S.A., Inc.

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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	:	
TARO PHARMACEUTICALS NORTH	:	Honorable Jose L. Linares, U.S.D.J.
AMERICA, INC. and TARO	:	
PHARMACEUTICALS U.S.A., INC.,	:	Civil Action No. 09 CV 3569 (JLL)(CCC)
	:	
	:	
Plaintiffs,	:	
	:	
v.	:	<b>ORDER GRANTING ADMISSION</b>
	:	<b><i>PRO HAC VICE</i></b>
SYNERX PHARMA, LLC; KARALEX	:	
PHARMA, LLC; and DPT LABORATORIES,	:	
LTD.,	:	
	:	
Defendants.	:	
	:	
_____	x	

**THIS MATTER**, being opened to the Court by Winston & Strawn LLP, attorneys for Plaintiffs, Taro Pharmaceuticals North America, Inc. and Taro Pharmaceuticals U.S.A., Inc., for an Order allowing James F. Hurst and David S. Bloch to appear and participate *pro hac vice* in this matter, and the Court having considered the papers submitted in support of said Motion, and for good cause shown pursuant to *L. Civ. R. 101.1(c)*;

**IT IS** on this \_\_\_\_\_ day of \_\_\_\_\_ 2010,

**ORDERED**, as follows:

1. James F. Hurst, member of the Bar of the State of Illinois, and David S. Bloch, member of the Bar of the State of California and the Bar of the District of Columbia, be and hereby are permitted to appear *pro hac vice* in the above-captioned matter pursuant to *L. Civ. R.* 101.1(c), United States District Court for the District of New Jersey; provided, however, that all pleadings, briefs, and other papers filed with the Court shall be signed by James S. Richter, a member in good standing of the Bar of the Supreme Court of New Jersey and the Bar of this Court, or other members in good standing of the Bar of the Supreme Court of New Jersey and the Bar of this Court who are employed in the Newark office of Winston & Strawn LLP, who shall be held responsible for said papers and for the conduct of the case and who shall be present before the Court during all phases of this proceeding, unless expressly excused by the Court, as well as be held responsible for the conduct of the attorneys admitted *pro hac vice* pursuant to this Order.

2. James F. Hurst and David S. Bloch shall pay the annual fee to the New Jersey Lawyers' Fund for Client Protection in accordance with New Jersey Court Rule 1:28-2 within twenty (20) days from the date of the entry of this Order.

3. James F. Hurst and David S. Bloch shall make a payment of \$150.00 pursuant to *L. Civ. R.* 101(c)(3) payable to the Clerk, U.S. District Court.

4. James F. Hurst and David S. Bloch shall be bound by the Local Civil Rules of the United States District Court for the District of New Jersey, including, but not limited to, the provisions of *L. Civ. R.* 104.1, *Discipline of Attorneys*.

5. James F. Hurst and David S. Bloch shall be deemed to have agreed to take no fee in any tort case in excess of the New Jersey State Court Contingency Fee Rule 1:21-7, as amended.

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Honorable Claire C. Cecchi, U.S.M.J.